

**THIS OMNIBUS OBJECTION SEEKS TO RECLASSIFY CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT 1 ATTACHED TO THE PROPOSED ORDER.**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Robert J. Feinstein, Esq. (admitted *pro hac vice*)  
Bradford J. Sandler, Esq.  
Paul J. Labov, Esq.  
Colin R. Robinson, Esq.  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Email: rfeinstein@pszjlaw.com  
bsandler@pszjlaw.com  
plabov@pszjlaw.com  
crobinson@pszjlaw.com

*Counsel to the Plan Administrator*

In re:

BED BATH & BEYOND INC., *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 23-13359 (VFP)  
(Jointly Administered)

**Hearing Date: April 22, 2025  
Hearing Time: 10:00 a.m. (ET)  
Response Deadline: April 15, 2025**

**ORAL ARGUMENT WAIVED UNLESS  
RESPONSES ARE TIMELY FILED**

**NOTICE OF OBJECTION TO YOUR CLAIM**

**TO: EACH CLAIMANT LISTED ON EXHIBIT A TO THE OBJECTION<sup>2</sup>**

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

Michael Goldberg, solely in his capacity as the Plan Administrator (the “Plan Administrator”) to 20230930-DK-Butterfly-1, Inc. (f/k/a/ Bed Bath & Beyond Inc.)<sup>3</sup> and affiliated debtors (the “Debtors”) has filed the enclosed *Plan Administrator’s Sixteenth Omnibus Objection (Substantive) to Claims (Reclassified Gift Card/Merchandise Credit Claims No. 13)* (the “Objection”) which seeks to alter your rights by reclassifying your claim as a general unsecured claim. At this time, the Plan Administrator merely seeks to reclassify your claim as a general unsecured claim and does not seek to disallow or reduce the amount of your claim. He reserves the right to do so, however, pursuant to future objection. You should look for your name on **Exhibit 1** attached to the Proposed Order (Exhibit A to the Objection) enclosed herewith and review the Objection carefully.

If you disagree with the Objection, you must file a response to the Objection with the Clerk of the Bankruptcy Court at the address below on or before **April 15, 2025**.

Clerk of Court  
United States Bankruptcy Court  
for the District of New Jersey  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

At the same time, you must also serve a copy of the response upon the Plan Administrator’s attorneys:

---

<sup>2</sup> In accordance with Local Bankruptcy Rule 3007-2, the Claims Agent served a separate copy of this Notice that was specifically tailored to each individual identified on Exhibit A to the Objection.

<sup>3</sup> Pursuant to the *Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc.*, which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as “Bed Bath & Beyond Inc.” was changed to *20230930-DK-Butterfly, Inc.* [Filing ID No. 230921001833 DOS ID 315602].

Robert J. Feinstein, Esq.  
Bradford J. Sandler, Esq.  
Paul J. Labov, Esq.  
Colin R. Robinson, Esq.  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017

If you file a response, you or your attorney must appear at a hearing on the Objection that will be held before the Honorable Vincent F. Papalia on **April 22, 2025, at 10:00 a.m.** at the United States Bankruptcy Court, Courtroom No. 3B, Martin Luther King, Jr. Federal Building, 50 Walnut Street Newark, New Jersey 07102.

**PLEASE TAKE NOTICE** that parties may make arrangements to appear telephonically by Court Solutions at <http://www.court-solutions.com>, no later than 3:00 p.m. the court day prior to the hearing.

**IF YOU DO NOT RESPOND TO THE OBJECTION, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: March 18, 2024

*/s/ Bradford J. Sandler*

---

Robert J. Feinstein, Esq. (admitted *pro hac vice*)  
Bradford J. Sandler, Esq.  
Paul J. Labov, Esq.  
Colin R. Robinson, Esq.  
**PACHULSKI STANG ZIEHL & JONES LLP**  
780 Third Avenue, 34th Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Email: rfeinstein@pszjlaw.com  
bsandler@pszjlaw.com  
plabov@pszjlaw.com  
crobinson@pszjlaw.com

*Counsel to the Plan Administrator*